U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 17, 2016

BY ECF AND EMAIL

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan Federal Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Jason Galanis,
15 Cr. 643 (PKC)

Dear Judge Castel:

The Government writes in response to the letter, dated October 7, 2016, from non-party ECC SPE LLC ("ECC"), seeking to be added as an interesedt party in connection with the forfeiture of certain property in the above-captioned matter. Without expressing any view on the merits of any claim to be made by ECC, the Government has no objection to ECC's being added as an interested party.

In connection with ECC's announced intention to file a claim in this matter, the Government submits for the Court's consideration, as Exhibit A hereto, a stipulation between the Government and ECC extending until November 30, 2016, the time by which ECC is required to file any claim in this matter. This additional time will give the parties an opportunity to negotiate a potential disposition of the claim in advance of its being filed.

In similar vein, the Government submits, as Exhibits B and C hereto, stipulations between the Government and the Board of Managers of one of the forfeited properties, and between the Government and Monet Berger, Jason Galanis's wife, similarly extending their respective time to file claims until November 30, 2016, in order to allow for pre-filing negotiations regarding their potential claims.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/ Brian R. Blais
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cc: Thomas Mazzucco, Esq. (by ECF)